

## Exhibit 1

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

FRANCESCO GALLO,	)	
	)	
Plaintiff,	)	
	)	
	)	INDEX NO:
ALITALIA - LINEE AEREE	)	
ITALIANE - SOCIETA PER AZIONI;	)	07 CV 06418
PIERANDREA GALLI; and	)	
GIULIO LIBUTTI,	)	
	)	
Defendants.	)	

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VIDEOTAPED DEPOSITION OF PIERANDREA GALLI

New York, New York

Monday, January 28, 2008

MAGNA LEGAL SERVICES  
Two Penn Center  
Suite 910  
Philadelphia, PA 19102

Page 38

1 So there was something that was not  
2 controlled well, and so they took the decision.  
3 Q So Mr. Marchese had an issue of  
4 controlling something well?  
5 A Yes.  
6 Q Would you say that was a job  
7 performance issue?  
8 A Can you repeat, please?  
9 Q Would you say that was a job  
10 performance issue?  
11 A It's a matter of — it's related to  
12 the audit. So, yes, it's part of his duty.  
13 Q So was the decision to terminate  
14 Mr. Marchese made because he wasn't doing his  
15 duties?  
16 MR. KORAL: Objection.  
17 THE WITNESS: Part of his duties.  
18 BY MR. AKIN  
19 Q That he wasn't performing part of his  
20 duties?  
21 A (Witness nods head.)  
22 MR. KORAL: Objection.  
23 BY MR. AKIN:  
24 Q You have to answer.  
25 A Yes.

Page 40

1 THE WITNESS: Good.  
2 BY MR. AKIN:  
3 Q Did you have to write any reviews  
4 regarding Mr. Gallo's performance?  
5 A No.  
6 Q Did you have to report Mr. Gallo's  
7 performance to anybody?  
8 Did you have to report Mr. Gallo's  
9 performance to anybody?  
10 A No.  
11 Q Was there anybody else that Mr. Gallo  
12 answered to, besides yourself?  
13 A Yes.  
14 Let's say, functional link with all  
15 departments in Rome that are dealing with legal  
16 security issue.  
17 Q And that does not go through you —  
18 excuse me. Strike that.  
19 That did not go through you at the time?  
20 A No. No.  
21 Q Did Mr. Gallo's title ever change?  
22 MR. KORAL: Objection.  
23 Any time during his career?  
24 MR. AKIN: Any time after July 2003,  
25 after you arrived in New York.

Page 39

1 Q She can't take down head nods.  
2 Now, going back to Mr. Gallo; when you  
3 arrived in New York, he was the head of  
4 corporate affairs.  
5 What were his duties and obligations as  
6 the head of corporate affairs?  
7 A He had to handle relationship with,  
8 let's say, institution, regarding safety and  
9 security. He was dealing with union. And all  
10 legal issue of the company.  
11 And he was also the head of — how can  
12 I explain — the relation with media.  
13 Q Public relations?  
14 A Yes. Kind of public relations.  
15 Q Now, you said, "and all relations  
16 with institutions."  
17 What does that mean?  
18 A Relation with Washington; with TSA,  
19 the safety/security agency. And all the  
20 corporate affairs regarding Alitalia  
21 North America.  
22 Q During the one year that you were  
23 stationed in New York, how was Mr. Gallo's job  
24 performance?  
25 MR. KORAL: Objection.

Page 41

1 THE WITNESS: No.  
2 BY MR. AKIN:  
3 Q Do you know when Mr. Gallo's  
4 employment with Alitalia ended?  
5 A It was his decision to accept a  
6 consultancy agreement with Alitalia in  
7 September 205 (sic).  
8 MR. KORAL: 2005.  
9 THE WITNESS: Yes.  
10 BY MR. AKIN:  
11 Q Now, how did the consultation  
12 agreement come about?  
13 A Can you be more precise?  
14 Q Yes. Sure.  
15 Who brought up the consultation agreement  
16 first?  
17 MR. KORAL: Objection.  
18 BY MR. AKIN:  
19 Q Who brought it up? How did it come  
20 about?  
21 A There was, during the year 2002,  
22 2003, 2004, some, let's say, packages offered  
23 to the executives in Italy. And when I arrived  
24 in US, I told Frank about that. And if he  
25 wanted, I can put through Rome and have such